

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

GEORGE A. JACKSON, et al.,)	
)	
Plaintiffs,)	
)	
v.)	C. A. No. 05-823-***
)	
STANLEY TAYLOR, et al.,)	JURY TRIAL REQUESTED
)	
Defendants.)	

**DEFENDANTS RICHARD CROCKETT, BETHANY EVANS, AND ROBERT
MANUEL’S MOTION FOR ENLARGEMENT OF TIME OUT OF TIME PURSUANT
TO FED. R. CIV. P. 6(b)2 TO RESPOND TO PLAINTIFFS’
REQUESTS FOR INTERROGATORIES**

1. The plaintiffs are inmates incarcerated and under the supervision of the Delaware Department of Correction (“DOC”) housed at the Sussex Correctional Institution (“SCI”) Georgetown, Delaware.

2. On or about December 1, 2005, the inmate plaintiffs under the direction of plaintiff George Jackson, (“Jackson”) commenced this action by filing a Complaint pursuant to 42 U.S.C. §1983 with leave to proceed *in forma pauperis* alleging Eighth and Fourteenth Amendment Due Process violations against the following defendants: Stan Taylor, Joyce Talley and Carl Anson. (D.I.#2). On or about October 10, 2006, Jackson filed a Motion to Amend the Complaint to add the following DOC Defendants: Michael Knight, Chris Senato, Bethany Evans, Debbie Melvin, Richard Crockett, Richard Manuel, Wentson White and Steven Rayner. (D.I.#117).

3. On or about February 15, 2007, Jackson filed a *Request for Interrogatories* directed to the above mentioned defendants in the Amended Complaint. (D.I.#142). On or about

March 12, 2007, Defendants Knight, Senato, Melvin, White and Rayner filed their Responses to the Interrogatories. (D.I.##147-152).

4. Counsel has not filed the Interrogatory Responses for Defendants Manuel, Crockett and Evans as she has been waiting for their Verification Forms to attach to their Interrogatory Responses. Today, counsel received the Verification Forms of the three remaining Defendants; Crockett, Evans and Manuel.

5. This is the Defendants' first request for an extension of time in which to file their responses to Plaintiffs' Request for Interrogatories.

6. A form of order is attached to this motion that will grant Defendants a five (5) day extension from March 14, 2007, date until today, March 19, 2007, in which to file responses to Plaintiffs' Request for Interrogatories.

WHEREFORE, for the hereinabove reasons, the Defendants respectfully request that this Court grant Defendants' request for an extension of time of five days in which to file their Responses to Plaintiffs' Request for Interrogatories.

**STATE OF DELAWARE
DEPARTMENT OF JUSTICE**

/s/ Eileen Kelly
Eileen Kelly, ID#2884
Deputy Attorney General
Department of Justice
State of Delaware
Carvel State Office Building
820 North French Street, 6th
Attorney for Defendants

Dated: March 19, 2007

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

GEORGE A. JACKSON, et al.,)	
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7.1.1 CERTIFICATION OF COUNSEL

The counsel for the Defendants, Deputy Attorney General Eileen Kelly, files this certification in compliance with Rule 7.1.1 of the Local Rules of Civil Procedure and certifies that:

1. Plaintiffs are inmates incarcerated in the Delaware Correctional system, at the Sussex Correctional Institution, Georgetown, Delaware.
2. Since the Plaintiffs are not able to be reached by telephone counsel for the Defendants has spent no time in attempting to reach an agreement on the subject of the motion for enlargement of time.
3. She assumes that the motion is opposed.

DEPARTMENT OF JUSTICE
STATE OF DELAWARE

/s/ Eileen Kelly
Eileen Kelly, ID #2884
Deputy Attorney General
Department of Justice
State of Delaware
820 N. French St.
Wilmington, De 19801
(302)577-8400
Attorney for Defendants

Dated: March 19, 2007

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16.5 CERTIFICATION

In compliance with Local Rule of Civil Procedure 16.5, counsel for the Defendants making the request for an extension of time files this certification and states:

I certify that I have sent a copy of the request for an extension of time to file discovery responses to the Defendants.

DEPARTMENT OF JUSTICE
STATE OF DELAWARE

/s/ Eileen Kelly
Eileen Kelly, ID#2884
Deputy Attorney General
Department of Justice
820 N. French St.
Wilmington, De 19801
(302)577-8400
Attorney for Defendants

Dated: March 19, 2007

CERTIFICATE OF SERVICE

I hereby certify that on March 19, 2007, I electronically filed *Defendants Richard Crockett, Bethany Evans and Robert Manuel's Motion for Enlargement of Time Out of Time to Respond to Plaintiffs' Requests for Interrogatories* with the Clerk of Court using CM/ECF. I hereby certify that on March 19, 2007, I have mailed by United States Postal Service, the document to the non-registered parties on the attached list.

/s/ Eileen Kelly
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List of Non-Registered Parties

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